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Ben G. Almond
Vice President-
Federal Regulatory

FEDERAL COMMUNICATIONS COMMISSION
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December 22, 1998

Ms Magalie Roman Salas
Federal Communications Commission
445 Twelfth Street, N.W.
12th Street Lobby, Room TW-A325
Washington, DC 20554

EX PARTE OR LATE FILED

Re: Cellular Telecommunications Industry Association's Petition For Forbearance from
CMRS Number Portability Obligations, WT Docket No. 98-229 **Ex Parte**

Dear Ms. Salas:

This is to inform you that on December 22, 1998, Anna D. Miller and Gary Hight of BellSouth Cellular Corporation, Michele D. Young, a consultant on behalf of BellSouth Cellular Corporation and Ben Almond of BellSouth Corporation met with Yog Varma, Deputy Chief of the Common Carrier Bureau and the following FCC personnel from the Network Services Division: Blaise Scinto, Gayle Radley Teicher, Leslie J. Selzer, and Jeannie Grimes. The meeting involved a discussion of the major issues being addressed in the docket proceeding mentioned above. The attached document was used for discussion purposes.

Please associate this notification and accompanying material with the referenced docket proceeding.

If you have any questions, please contact the undersigned.

Sincerely,



VP- Federal Regulatory

Attachment:

cc: Yog Varma
Blaise Scinto
Gayle Radley Teicher
Leslie J. Selzer
Jeannie Grimes

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**Should CMRS Participate in
LRN-based Number Resource
Optimization measures?**

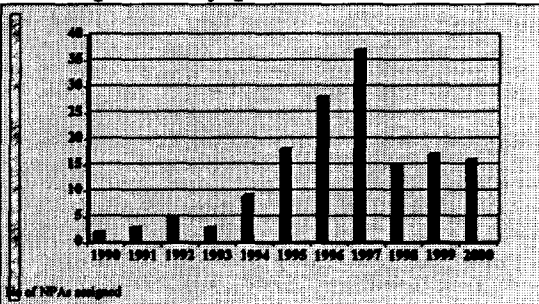
Presented to the FCC by:
BellSouth Cellular Corporation
December 22, 1998

Do we really have a long-term
number resource problem ?

**■ Rate of NPA assignment is starting
to slow:**

- 152 *total* NPAs on 1/1/95
- 83 NPAs Assigned 1995-1997 (27/year
average)
- 48 NPAs projected 1998-2000 (16/year
average)

New entrant/technology demand
has probably peaked:



Wireline number utilization trends

- Wireline subscriber growth has averaged 4%
- In BellSouth territory, only three new area code relief efforts expected between now and 2002
- CLECs have been assigned 1871 NXXs (inventory of 18.7 million numbers in BellSouth alone)

Wireless number utilization trends

- Wireless annual subscriber growth is 20%
- Larger than wireline local service areas promote efficiency
- Wireless utilization higher than expected number pooling yields
 - Miami 76%
 - Atlanta 71%
 - Mobile 62%
 - System wide average degraded to @50% by wireline rate center paradigm

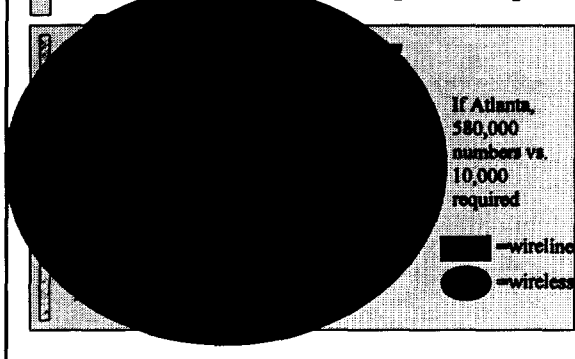
What factors have influenced NANP status?

- Wireline convention is 1 NXX per ILEC rate center
 - Atlanta = 58 rate centers/580,000#s/carrier/NPA
- Wireless convention is 1 NXX per local serving area
- Existing NXX Assignments

	ILEC CMRS CLEC		
ATL (678/770)	451	203	368

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Wireless NXX coverage example



CMRS-related number pooling considerations

- Yields are disappointing
- CMRS efficiencies already exceed those expected from pooling
- CMRS participation would amount to a "backward step" in efficiency
- NXX assignment guideline modification and enforcement
- If pools become the sole source of numbers, every number is a ported number
- All carriers/end users will pay cost for wireless number pooling

CMRS-related number pooling risks

- Wireless not integrated into LNP, let alone number pooling
- Only carriers with same rate centers can share the same pool ~ wireless would have separate pools
- CMRS local serving areas cross LATAs and state boundaries
- Wireless churn/growth will seriously challenge LNP infrastructure
- UNP/ITN precludes instant activation and presents a competitive barrier for wireless

BSCC Recommendation:

■ *Wireless number pooling participation is unnecessary and detrimental to the industry and consumers*

■ *Wireline cost/benefit analysis/nationwide industry guidelines/trials prior to number pooling*

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